

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

IN RE: BARD IVC FILTERS
PRODUCTS LIABILITY LITIGATION

No. 2:15-md-2641-PHX-DGC

This Document Relates to:

Eileen Jordan v. C.R. Bard, Inc., et al.,

Civil Action No.
2:18-cv-01343-PHX-DGC

**MOTION FOR LEAVE TO WITHDRAW AS COUNSEL FOR PLAINTIFF, EILEEN
JORDAN**

Movant, Ferrer, Poirot & Wansbrough (“FPW”), by and through the undersigned attorney, licensed in Texas, and pursuant to Local Rule 83.3, respectfully moves for leave to withdraw as counsel of record for Plaintiff, Eileen Jordan, in the above-styled case, because:

1. Pursuant to Rule 1.15, *Tex. R. Disciplinary Conduct*:

(1) withdrawal can be accomplished without material adverse effect on the interests of Eileen Jordan;

(4) Eileen Jordan insists upon pursuing an objective that FPW considers imprudent or with which the lawyer has fundamental disagreement; and

(6) the representation will result in an unreasonable financial burden on FPW or has been rendered unreasonably difficult by Eileen Jordan. Rule 1.15 (b)(1)(4)(6), *Tex. R. Disciplinary Conduct*

2. Movant has communicated its intent to withdraw to Eileen Jordan, and Ms.

Jordan consents to FPW’s withdrawal.

3. Ms. Jordan has been advised of the status of her case, including pending compliance with existing Court orders. Good cause exists for granting this Motion.

4. Pursuant to Local Rule 83.3(b), the last known information regarding the Plaintiff is as follows:

Name: Eileen Jordan

Last known residence: 2241 Tulip Valley Point, Sanford, FL 32771

Last known phone number: 321-356-3160

E-mail address: nghtgale78@aol.com

5. Movant certifies that withdrawal would not delay trial of this matter or otherwise prejudice the Defendants as this matter is not set for trial, nor are any dispositive motions pending or hearings set.

6. Pursuant to Local Rule 7.1(b)(2), a proposed order is attached to this motion.

WHEREFORE, John T. Kirtley, III and Ferrer, Poirot & Wansbrough respectfully request that this Honorable Court grant this Motion for Leave to Withdraw as Counsel for Plaintiff Eileen Jordan.

Respectfully submitted,
FERRER, POIROT, & WANSBROUGH

By: /s/John T. Kirtley, III
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Attorneys for Plaintiff

CERTIFICATION OF ATTORNEY

I certify that:

1. Plaintiff, Eileen Jordan has been advised, in writing, of the contents of this Motion and the basis of FPW to withdraw from representation. Ms. Jordan consents to FPW's withdrawal from representation.

2. A true and correct copy of the above pleading was served on February 9, 2021, on all counsel of record, by ECF and/or Email in accordance with the *Federal Rules of Civil Procedure* and to Eileen Jordan at the above email address.

/s/John T. Kirtley, III
John T. Kirtley, III